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VIA ECF

Hon. James B. Clark, III
United States District Court of New Jersey
Court Room MLK 2A
50 Walnut Street
Newark, NJ 07102

Re: Flores v. Paradise Trips, LLC, et al.
Case No.: 2:23-cv-22894-EP-JBC

Judge Clark:

As you are aware, this office represents Defendants Paradise Trips, LLC, James Johns, Rush Enterprises, Rush Truck Leasing, Inc., PACCAR Inc., PACCAR Leasing Corporation and Esther Kubrock Dubosque in the above-captioned matter. Please accept this letter in response to Plaintiff's letter to the Court dated May 6, 2024.

The letter from Counsel specifically references discovery responses served on behalf of Defendants Rush Enterprises, Rush Truck Leasing, Inc., PACCAR Inc. and PACCAR Leasing Corporation. While Counsel may be dissatisfied with the results of responses, the aforementioned Defendants have turned over each and every document in their possession. Of note, Defense Counsel has been working with in-house Counsel for the aforementioned entities in order to provide a full and complete response to Plaintiff's demands to the best of the abilities of the entities. As far as those Defendants are concerned, there is simply nothing left to produce.

While Defendants can appreciate Counsel's position and stand ready, able and willing to produce all appropriate discovery, Defendants, as discussed above, have not only performed extensive searches of their records, but have also turned over each and every relevant document or piece of information available to them. Again, at this point there is simply nothing left for Defendants to produce.

Thank you for your time and attention to the matter.

Respectfully submitted,

/s/ William P. Perrelli